

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

LULAC, et. al., §

Plaintiffs §

Eddie Bernice Johnson, Sheila §
Jackson-Lee, Alexander Greem, and
Jasmine Crockett

Plaintiff-Intervenors

V. § Case No.: 3-21-CV-00259-DCG-

§ JES-JVB [Lead Case]

GREG ABBOTT, in his official capacity §
As Governor of Texas, et. al.

Defendants. §

§

**PLAINTIFF-INTERVENORS, ALEXANDER GREEN AND JASMINE
CROCKETT'S AGREED MOTION FOR LEAVE TO PRESENT LIVE
TESTIMONY VIA VIDEOCONFERENCE AT TRIAL**

Pursuant to Federal Rule of Civil Procedure 43(a), Plaintiff-Intervenors *et al.*, hereby respectfully move the Court for leave to present live testimony via videoconference of Dr. Richard Murray during the trial scheduled to begin May 21, 2025, as provided in the Court's Pretrial Scheduling Order. Dkt. 880 at 7 ("The Court is nonetheless willing to consider reasonable accommodations for witnesses given this case's scale and complexity."). This motion is agreed by State Defendants. In support thereof, Plaintiff-Intervenors state the following:

1. Plaintiff-Intervenors seek to present only one of their scheduled witnesses via videoconference. That witness is Dr. Richard Murray.
2. Plaintiff-Intervenors counsel have made every effort to arrange in-person testimony and

seek this accommodation only because such arrangements could not be made. Dr.

Murray has good cause and compelling circumstances that prevent his appearance in person at trial.

3. Dr. Murray has undergone three major surgeries recently that cause severe mobility issues.
4. Allowing testimony via videoconference will promote judicial efficiency and reduce unnecessary delay and cost, consistent with Fed. R. Civ. P. 43(a).

Plaintiff-Intervenors therefore respectfully request that the Court grant leave to present live testimony via videoconference for the above-mentioned Intervenor-Plaintiff witness during the trial.

Date: May 19, 2025 Respectfully submitted,

CERTIFICATE OF CONFERENCE

I certify that I conferred with the parties regarding the relief requested in this motion via email on May 16th, 2025. Counsel for Defendants stated that they are not opposed to Dr. Richard Murray testifying remotely. The remaining parties do not oppose the motion.

/s/Gary Bledsoe
Gary Bledsoe

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that she has electronically submitted a true and correct copy of the above and foregoing via the Court's electronic filing system on the 19th day of May 2025.

/s/Gary Bledsoe
Gary Bledsoe